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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

JOANA DARC FERREIRA,
Plaintiff,

vs.

KILOLO KIJAKAZI, Acting
Commissioner of Social Security,
Defendant.

Case No. 1:22-cv-00163-JLT-BAM
STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF
TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from August 19, 2022 to October 18, 2022, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. Defendant shall serve on Plaintiff with Defendant's Cross-Motion for Summary Judgment by December 2, 2022. Plaintiff may file an optional reply brief by December 19, 2022.

1 This is Plaintiff's first request for an extension of time. Good cause exists
2 for Plaintiff's request. In the months of May through July 21, 2022, Counsel has
3 received an influx of Social Security Certified Administrative Records (CAR). A
4 review of the records received shows Counsel has received at least 50 CARs, the
5 majority of which were filed in June 2022.

6 Additionally, for the weeks of August 15, 2022 and August 22, 2022,
7 Counsel currently has 13 merit briefs, and several letter briefs and reply briefs.
8 Additional time is needed to thoroughly brief this matter for the Court.

9 Defendant does not oppose the requested extension. Counsel apologizes to
10 the Defendant and Court for any inconvenience this may cause.

11
12 Respectfully submitted,

13 Dated: August 9, 2022 PENA & BROMBERG, ATTORNEYS AT LAW
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15 By: /s/ Jonathan Omar Pena
16 JONATHAN OMAR PENA
17 Attorneys for Plaintiff
18

19 Dated: August 9, 2022 PHILLIP A. TALBERT
20 United States Attorney
21 PETER K. THOMPSON
22 Acting Regional Chief Counsel, Region IX
23 Social Security Administration
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25 By: */s/ Sharon Lahey
26 Sharon Lahey
27 Special Assistant United States Attorney
28 Attorneys for Defendant
(*As authorized by email on August 9, 2022)

ORDER

Based upon the parties' stipulation for an extension of time, and for good cause shown, Plaintiff shall have an extension of time, from August 19, 2022, to October 18, 2022, to file a Motion for Summary Judgment. Defendant shall file a Cross-Motion for Summary Judgment by December 2, 2022. Plaintiff may file an optional reply brief by December 19, 2022.

IT IS SO ORDERED.

Dated: August 10, 2022

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE